

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SOLAS OLED LTD.,)	
)	
Plaintiff,)	
)	Civil Action No. 6:19-CV-00515-ADA
v.)	
)	
GOOGLE LLC,)	
)	
Defendant.)	
_____)	

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

The parties respectfully submit the attached Protective Order for the Court's signature. The parties previously submitted a Protective Order (Dkt. 59, entered as Dkt. 62) that inadvertently omitted a revision to paragraph 7. The attached Protective Order corrects paragraph 7 and contains no other changes. The parties request that the Court enter the attached Protective Order, which supersedes the previously-entered Protective Order (Dkt. 62).

Dated: May 6, 2020

/s/ Reza Mirzaie_____

Marc Fenster (CA SB No. 181067)
Reza Mirzaie (CA SB No. 246953)
Neil A. Rubin (CA SB No. 181067)
Kent N. Shum (CA SB No. 259189)
RUSS AUGUST & KABAT
12424 Wilshire Boulevard 12th Floor
Los Angeles, California 90025
Telephone: 310-826-7474
Facsimile: 310-826-6991
E-mail: mfenster@raklaw.com
E-mail: rmirzaie@raklaw.com
E-mail: nrubin@raklaw.com
E-mail: kshum@raklaw.com

Sean A. Luner
CA State Bar No. 165443

Gregory S. Dovel
CA State Bar No. 135387
Jonas B. Jacobson
CA State Bar No. 269912
DOVEL & LUNER, LLP
201 Santa Monica Blvd., Suite 600
Santa Monica, CA 90401
Telephone: 310-656-7066
Email: sean@dovel.com
Email: greg@dovel.com
Email: jonas@dovel.com

T. John Ward, Jr.
Texas State Bar No. 00794818
E-mail: jw@wsfirm.com
Claire Abernathy Henry
Texas State Bar No. 24053063
E-mail: claire@wsfirm.com
Andrea L. Fair
Texas State Bar No. 24078488
E-mail: andrea@wsfirm.com
WARD, SMITH & HILL, PLLC
PO Box 1231
Longview, Texas 75606-1231
(903) 757-6400 (telephone)
(903) 757-2323 (facsimile)

**ATTORNEYS FOR PLAINTIFF
SOLAS OLED, LTD.**

Dated: May 6, 2020

By /s/ Michael E. Jones

Michael E. Jones
SBN: 10929400
POTTER MINTON, PC
110 North College, Suite 500
Tyler, Texas 75702
Telephone: (903) 597-8311
Facsimile: (903) 593-0846
mikejones@potterminton.com

Brian M. Cook
O'Melveny & Myers LLP
400 South Hope Street, 18th Floor
Los Angeles, CA 90071-2899
213-430-6000

Fax: 213-430-6407
Email: bcook@omm.com

Nicholas J. Whilt
O'Melveny & Myers LLP
400 S. Hope St., 18th Floor
Los Angeles, CA 90071
(213) 430-6000
Fax: (213) 430-6407
Email: nwhilt@omm.com

Darin W. Snyder
O'Melveny & Myers LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111-3823
415-984-8846
Fax: 415-984-8701
Email: dsnyder@omm.com

David S. Almeling
O'Melveny & Myers LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111-3823
415-984-8700
Fax: 415-984-8701
Email: dalmeling@omm.com

Ryan K Yagura
O'Melveny & Myers - LA
400 South Hope Street, 18th Floor
Los Angeles, CA 90071-2899
213-430-6189
Fax: 213-430-6407
Email: ryagura@omm.com

Mark Liang
O'Melveny and Myers LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111
415-984-8700
Fax: 415-984-8701
Email: mliang@omm.com

Eric Y. Su
O'Melveny & Myers LLP
400 South Hope Street, 18th Floor

Los Angeles, CA 90071
213-430-6000
Fax: 213-430-6407
Email: esu@omm.com

**ATTORNEYS FOR DEFENDANT,
GOOGLE LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on May 6, 2020.

/s/ Reza Mirzaie

Reza Mirzaie